

1 MAYER BROWN LLP
2 LEE H. RUBIN (SBN 141331)
3 lrubin@mayerbrown.com
4 EDWARD D. JOHNSON (SBN 189475)
5 wjohnson@mayerbrown.com
6 DONALD M. FALK (SBN 150256)
7 dfalk@mayerbrown.com
8 ERIC B. EVANS (SBN 232476)
9 eevans@mayerbrown.com
10 ANNE M. SELIN (SBN 270634)
11 aselin@mayerbrown.com
12 Two Palo Alto Square, Suite 300
13 3000 El Camino Real
14 Palo Alto, CA 94306-2112
15 Telephone: (650) 331-2000
16 Facsimile: (650) 331-2061

17 *Attorneys for Defendant
18 Google Inc.*

19 [Additional Counsel on Signature Page]

20
21 **UNITED STATES DISTRICT COURT**
22
23 **NORTHERN DISTRICT OF CALIFORNIA**
24
25 **SAN JOSE DIVISION**

26 IN RE: HIGH-TECH EMPLOYEE
27 ANTITRUST LITIGATION

28 THIS DOCUMENT RELATES TO:
ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**[PROPOSED] ORDER GRANTING
DEFENDANTS' JOINT RESPONSE TO
PLAINTIFFS' ADMINISTRATIVE
MOTION TO SEAL REGARDING
FILINGS RELATED TO PLAINTIFFS'
OPPOSITION TO DEFENDANTS'
JOINT MOTIONS *IN LIMINE***

Having considered Defendants' Joint Response to Plaintiffs' Administrative Motion to Seal Regarding Filings Related to Plaintiffs' Opposition to Defendants' Joint Motions *In Limine* [ECF No. 889] and the declarations submitted in support of that motion, having determined that the public disclosure of the confidential information described therein would harm Defendants, and finding good cause to seal that information, IT IS HEREBY ORDERED THAT the motion is GRANTED.

Pursuant to Northern District Civil Local Rule 79-5, the following portions of the following documents have been properly redacted and publicly filed, for the reasons provided in the corresponding declarations. The redacted portions shall remain under seal.

| Brief or Exhibit To Be Sealed | Source of Support for Sealing |
|--|---|
| Plaintiffs' Opposition to Defendants' Joint Motions <i>In Limine</i> (redacted portions) (Proposed redacted version filed at ECF No. 889-3) | Declaration of Anne M. Selin ISO Defs.' Joint Response to Plaintiffs' Administrative Motion to Seal Re: Filings Related to Plaintiffs' Opposition to Defs.' Joint Motions <i>In Limine</i> (ECF No. 894) ("Selin Decl.") at ¶ 4. |
| Ex. 1 to the Declaration of Anne B. Shaver ISO Plaintiffs' Opposition to Defendants' Joint Motions <i>In Limine</i> (ECF No. 881) ("Shaver Ex.") (redacted portions) (Proposed redacted version filed at ECF No. 889-1) | Selin Decl. at ¶ 5; Declaration of Christina Brown ISO Defs.' Joint Response to Plaintiffs' Administrative Motion to Seal Re: Filings Related to Plaintiffs' Opposition to Defs.' Joint Motions <i>In Limine</i> (ECF No. 893) ("Brown Decl.") at ¶ 3. |
| Shaver Ex. 13 (redacted portions) (Proposed redacted version filed at ECF No. 846) | Selin Decl. at ¶ 6; Brown Decl. ¶ 4; Declaration of Gregory M. Sergi on Behalf of Intel ISO Defs.' Joint Response to Plaintiffs' Administrative Motion to Seal Re: Filings Related to Plaintiffs' Opposition to Defs.' Joint Motions <i>In Limine</i> (ECF No. 892) ("Sergi Decl.") at ¶ 5. |
| Shaver Ex. 14 (redacted portions) (Proposed redacted version filed at ECF No. 842) | Selin Decl. at ¶ 7; Sergi Decl. ¶ 6; Declaration of Lin W. Kahn ISO Defs.' Joint Response to Administrative Motion to Seal (ECF No. 890) ("Kahn Decl.") at ¶ 9. |

| 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 |
|---|--|
| Brief or Exhibit To Be Sealed | Source of Support for Sealing |
| Shaver Ex. 15 (redacted portions) | Selin Decl. at ¶ 8. |
| (Proposed redacted version filed at ECF No. 842-2) | |
| Shaver Ex. 17 (redacted portions) | Selin Decl. at ¶ 9; Kahn Decl. at ¶ 10; Brown Decl. ¶ 5; Declaration of Roberta D. Tonelli ISO Defs.' Joint Response to Plaintiffs' Administrative Motion to File Under Seal (ECF No. 891) ("Tonelli Decl.") at ¶ 8. |
| (Proposed redacted version filed at ECF No. 832-2) | |
| Shaver Ex. 18 (redacted portions) | Selin Decl. at ¶ 10; Sergi Decl. ¶ 7; Brown Decl. ¶ 6. |
| (Proposed redacted version filed at ECF No. 856-8) | |
| Shaver Ex. 19 (redacted portions) | Selin Decl. at ¶ 11; Kahn Decl. at ¶ 11; Sergi Decl. ¶ 8; Tonelli Decl. at ¶ 9; Brown Decl. ¶ 7. |
| (Proposed redacted version filed at ECF No. 856-10) | |
| Shaver Ex. 80 (redacted portions) | Sergi Decl. ¶ 9. |
| (Proposed redacted version filed at ECF No. 889-11) | |
| Shaver Ex. 278 (redacted portions) | Brown Decl. ¶ 8. |
| (Proposed redacted version filed at ECF No. 889-5) | |
| Shaver Ex. 279 (redacted portions) | Brown Decl. ¶ 9. |
| (Proposed redacted version filed at ECF No. 889-7) | |
| Shaver Ex. 281A (redacted portions) | Brown Decl. ¶ 10. |
| (Proposed redacted version filed at ECF No. 889-9) | |

23 **IT IS SO ORDERED.**

24 Date: _____

25 HONORABLE LUCY H. KOH
26 United States District Court Judge